

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

_____)	
VOICEAGE EVS LLC,)	
)	
Plaintiff,)	
)	C.A. No. 19-1945 (GBW)
v.)	
)	
HMD GLOBAL OY,)	
)	
Defendant.)	
_____)	

JOINT STIPULATION AND [PROPOSED] ORDER TO STAY THE INSTANT ACTION

Plaintiff VoiceAge EVS LLC (“VoiceAge EVS”) and Defendant HMD Global Oy (“HMD”) (together the “Parties”) stipulate and agree as follows:¹

WHEREAS, the Parties previously requested and were granted extensions to the case deadlines based on certain outstanding responses to foreign third-party discovery (*see* D.I. 176, 180, 193, 196, 206);

WHEREAS, VoiceAge EVS has still not yet received responses from three of the ten foreign third-parties from which it timely sought foreign discovery;

WHEREAS, the Parties also have yet to complete certain limited follow-up party discovery based on discovery requests served to date;

¹ HMD agreed to join this motion in exchange for VoiceAge EVS’s agreement to continue to suspend the accrual of any prejudgment interest for the duration of the prior agreed extensions in fact discovery and the proposed stay (i.e., from July 31, 2024 through the end of the proposed stay). VoiceAge EVS’s agreement to continue to suspend any accrual of any prejudgment interest is conditioned on the Court entering this Order and is not an admission or concession that VoiceAge EVS would not otherwise be entitled to prejudgment interest during this period of time

WHEREAS, rather than continuing to seek extensions based on outstanding responses to foreign third-party discovery, the Parties have agreed good cause exists to temporarily stay this action and vacate deadlines until discovery can be obtained from foreign third-parties;

WHEREAS, the Parties have agreed that the stay requested herein shall be for a period following the date of the Court's order until foreign third-party discovery can be obtained;

WHEREAS, the requested stay is sought in good faith and not for purposes of delay, as the Parties believe a temporary stay will promote judicial economy and preserve the resources of both the Court and the Parties;

WHEREAS the Parties agree that they will not be prejudiced by this stay and their rights will be preserved during the pendency of the stay.

NOW THEREFORE, the Parties, by and through their undersigned counsel, subject to the Court's approval, stipulate and agree that:

1. This action shall be stayed and all deadlines vacated following the Court's approval of this stipulation;
2. The Parties will file a joint status report every six months following entry of this Order notifying the Court of the status of foreign third-party discovery and whether a stay is still warranted;
3. The Parties may lift the stay by filing a joint motion with the Court. Alternatively, a party may lift the stay by a showing that the stay is no longer warranted. In the event that a party intends to do so, such party shall give written notice to the other party that it intends to move to lift the stay, and the parties shall confer in good faith and submit a joint status report within three (3) business days of such notice.

Nothing in this agreement shall prevent a party from providing the Court with a status report at any time regarding any other proceeding between the parties or their affiliates that the party believes may inform the Court's resolution of this action.

Dated: November 7, 2025

Respectfully submitted,

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/s/ Michael J. Farnan

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Attorneys for Defendant HMD Global Oy

SO ORDERED this ____ day of November, 2025.

The Honorable Gregory B. Williams